

## STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

November 19, 2007

Ms. Shirley J. Olinger, Manager Office of River Protection United States Department of Energy P.O. Box 450, MSIN: H6-60 Richland, Washington 99352

Mr. William S. Elkins, Project Director Bechtel National, Inc. 2435 Stevens Center Place, MSIN: H4-02 Richland, Washington 99354



**EDMC** 

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form 24590-PTF-PCN-ENV-05-015; Class <sup>1</sup>1 Modification to the Hanford Facility Dangerous Waste and Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10 (Waste Treatment and Immobilization Plant), WA7890008967

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the referenced Class <sup>1</sup>1 Modification submitted November 7, 2007. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

Modification 24590-PTF-PCN-ENV-05-015 provides the updated engineering specification (24590-PTF-3PS-MEVV-T0002, Revision 4) for the Cesium Nitric Acid Recovery Forced Circulation Vacuum Evaporator System.

While Ecology approves this modification, several items require correction. Please issue a Specification Change Notice to correct the following:

- Delete the duplicated Contents pages (pages 1-3).
- Make a determination to spell out either "Safety Class," or "Seismic Category" throughout the document, as they both use the same acronym (SC) and update the acronym list (1.4.32).
- Restore alphabetical order to the acronym list (1.4.32).

Ms. Olinger and Mr. Elkins November 19, 2007 Page 2

- Change the last sentence of 3.18.2.2 from, "Seller shall demonstrate and record on VHS format videotape demister pad removal and replacement in their shop test," to, "Seller shall demonstrate and video record demister pad removal and replacement in their shop test."
- Delete the reference to Appendix F in 3.18.3.7.
- Restore 7.1.9, which read, "The Demister Pad Removal System/Manipulator shall be functionally tested prior to shipment. Two lengths of rail shall be used to verify performance of the manipulator on the rails. The support posts for these rails will be mounted to temporary base plates at the Seller's shop during the test to provide stability." (Section 3.18.2.2 of the specification also requires that this shop test be video recorded.)

These items must be corrected prior to incorporating the next revision of this specification into the permit.

If there are any questions, contact me at 509-372-7882 or Robbie Biyani at 509-372-7884.

Sincerely,

Brenda Becker-Khaleel WTP Permit Writer Nuclear Waste Program

Such & But Wall

bcs/jc Enclosure

cc electronic w/enc:

Dave Bartus, EPA
John Eschenberg, USDOE
Lori Huffman, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Don Sommer, USDOE
William Taylor, USDOE
Julie Colby, BNI

Brad Erlandson, BNI
Peggy Fisher, BNI
Stan Hill, BNI
Dennis Klein, BNI
Sandi Murdock, BNI
Suzette Thompson, FHI
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements 

Environmental Portal
USDOE-ORP Correspondence Control

## Hanford Facility RCRA Permit Modification Notification Form Part III, Operating Unit 10

## **Waste Treatment and Immobilization Plant**

Index

Page 2 of 3:

Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant Update Engineering Specification For Cesium Nitric Acid Recovery Forced Circulation Vacuum Evaporator System in Appendix 8.7 of the Dangerous Waste Permit.

Submitted by Co-Operator:

Reviewed by ORP Program Office:

24590-PTF-PCN-ENV-05-015

Quarter Ending December 31, 2007

Hanford Facility RCRA Permit Modification Notification Form			
Unit:	Permit Part & Chapter:		
Waste Treatment and Immobilization Plant	Part III, Operating Unit 10		

## **Description of Modification:**

The purpose of this Class 1 prime modification is to update the "Engineering Specification for Cesium Nitric Acid Recovery Forced Circulation Vacuum Evaporator System" in Appendix 8.7 of the Dangerous Waste Permit. The following source specification is submitted to replace the permitted specification currently in Appendix 8.7.

Appendix	8.7		
Replace:	24590-PTF-3PS-MEVV-TP002, Rev. 0	With:	24590-PTF-3PS-MEVV-T0002, Rev. 4

This modification requests Ecology approval and incorporation into the permit the specific changes to the specification that are identified by revision bars that have been issued since the last revision of the permitted version. Revisions are the result of ongoing design (changes from vendor preliminary data to vendor detailed design). The following identifies the significant changes that have been revised on the attached specification.

- Revised seismic response spectra requirements
- Updated safety class definitions
- Updated Codes, Standards and References
- Updated buyer supplied utilities steam supply conditions
- Updated construction requirements for threaded fittings
- Updated the Integrated Acceptance Test requirements
- Updated the Calculation requirements
- Deleted Appendix F "Evaporator Equipment Skids Locations"
- Added Appendix J "CNP Evaporator System Composite Analyses"
- Added Appendix K to provide location drain nozzle on reboiler steam condensate vessel

The following is a list of outstanding change documents that have not been incorporated into this modification:

Specification Change Notice (24590-PTF-3PN-MEVV-00021)

- opositionation straings it also (2 to to 1				
WAC 173-303-830 Modification Class: 1 2	Class 1	Class <sup>1</sup> 1	Class 2	Class 3
Please mark the Modification Class:	1	X		

Enter Relevant WAC 173-303-830, Appendix I Modification citation number:

N/A

Enter wording of WAC 173-303-830, Appendix I Modification citation:

In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class <sup>1</sup>1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."

<sup>1</sup> Class 1 modifications requiring prior Agency approval.

Ref: 24590-WTP-GPP-SENV-010

<sup>&</sup>lt;sup>2</sup> If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class 1, if applicable.

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Quarter Ending	December 31, 2007	

24590-PTF-PCN-ENV-05-015

Modification Approved: Yes No (state reason for denial)  Reason for denial:	Reviewed by Ecology:		
	B. Becker-Khaleel	11   19   07 - Date	